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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

**In re:**

**Case No. 09-40099 LT**

**WILLIAM JOSEPH REYES and  
LISA ANNE REYES,**

**Chapter 13**

**Debtors.**

**MOTION TO MODIFY CHAPTER 13  
PLAN; NOTICE TO CREDITORS OF  
DEADLINE TO REQUEST A HEARING**

The above-named Debtors apply to the court for an order modifying their chapter 13 plan as follows:

For the month of July 2009, Debtors shall pay the sum of \$200.00.

Commencing August 2009, Debtors shall pay the sum of \$650.00 per

month. Debtors surrender their residence to Wells Fargo Home

Mortgage, Bosco Credit, Franklin Credit, and the Contra Costa County

Tax Collector. Any plan arrearages shall be forgiven. Unsecured,

nonpriority creditors shall be paid on a pro-tanto basis.

The modification is sought on the following grounds: Debtors' vehicle needed to be repaired. In addition, Mrs. Reyes was able to find a job, but it pays less than Debtors originally projected.

**NOTICE IS HEREBY GIVEN:**

1 (i) That Local Rule 9014-1 of the United States Bankruptcy Court  
2 for the Northern District of California prescribes the procedures to  
3 be followed and that any objection to the requested relief, or a  
4 request for hearing on the matter, must be filed and served upon the  
5 undersigned within twenty (20) days of mailing of this notice;

6 (ii) That a request for hearing or objection must be accompanied  
7 by any declarations or memoranda of law the party objecting or  
8 requesting wishes to present in support of its position;

9 (iii) That if there is not a timely objection to the requested  
10 relief or a request for hearing, the Court may enter an order granting  
11 the relief by default; and

12 (iv) That the undersigned will give at least ten (10) days  
13 written notice of hearing to the objecting or requesting party, and to  
14 any trustee or committee appointed in the case, in the event an  
15 objection or request for hearing is timely made.

16 DATED: August 3, 2009

/s/ Corrine Bielejeski  
Corrine Bielejeski  
Attorney for Debtors